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Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

# UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

: Chapter 11

PURDUE PHARMA L.P., et al.,

: Case No. 19-23649 (RDD)

: Upointly Administered

TENTH MONTHLY FEE STATEMENT OF GILBERT LLP, FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS FOR THE PERIOD JULY 1, 2020 THROUGH JULY 31, 2020

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services	Ad Hoc Committee of Governmental and Other
to:	Contingent Litigation Claimants
<b>Date of Order Approving Debtors' Payment</b>	December 2, 2019 (Docket #553)
of Fees and Expenses of Applicant:	
Period for which compensation and	July 1, 2020 through July 31, 2020
reimbursement is sought:	
Amount of compensation sought as actual,	\$239,739.20 (80% of \$299,674.00)
reasonable, and necessary:	
Amount of expense reimbursement sought	\$2,750.89 (100%)
as actual, reasonable and necessary:	
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals entered by this Court on December 2, 2019 [Docket #553] (the "Reimbursement Order"), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket #529] (the "Procedures Order"), the law firm of Gilbert LLP ("Gilbert LLP"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the "AHC"), hereby submits this tenth monthly fee statement (the "Monthly Fee Statement") for legal services rendered and reimbursement for expenses incurred for the period commencing July 1, 2020 through July 31, 2020 (the "Application Period").

#### **Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$299,674.00 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$239,739.20.

- 2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$664.29. The blended hourly rate of paraprofessionals during the Application Period is \$236.50.
- 3. Annexed hereto as **Exhibit** C is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$2,750.89 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$2,750.89.
- 4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.
- 5. Pursuant to the Reimbursement Order, Gilbert LLP has separately recorded services performed relating to allocation of value among the Debtors' creditors, and to the best of Gilbert LLP's knowledge, has not included time relating to intercreditor allocation in this Monthly Fee Statement.

#### **FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

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7. Pursuant to the Procedures Order, any party objecting to the payment of interim

compensation and reimbursement of expenses as requested shall, within 14 days of service of the

Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures

Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors

shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and

100% of the expenses that are not subject to an objection. Any objection must set forth the

precise nature of the objection and the amount at issue. It shall not be sufficient to simply object

to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of

\$239,739.20 (80% of \$299,674.00) and reimbursement of reasonable and necessary expenses

incurred in the amount of \$2,750.89 (100%), for a total amount of \$242,490.09, for the

Application Period.

Dated: October 6, 2020

Washington, DC

Respectfully submitted,

**GILBERT LLP** 

/s/ Kami E. Quinn

Kami E. Quinn

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Counsel for the Ad Hoc Committee of Governmental and Other Contingent

Litigation Claimants.

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# Exhibit A Summary of Services by Category

# SUMMARY OF SERVICES BY PROJECT CATEGORY

Project		Hours Billed in	Fees for
Code	Project Category	Period	Period
A001	Asset Analysis & Recovery	436.9	\$245,905.00
A003	Business Operations	3.8	\$3,610.00
A004	Case Administration	17.8	\$15,417.50
A005	Claims Analysis	2.8	\$2,204.00
A006	Employment / Fee Applications	8.7	\$2,857.50
A009	Meetings / Communications with AHC & Creditors	14.8	\$14,565.00
A019	Plan of Reorganization / Disclosure Statement	15.2	\$15,115.00
		500.0	\$299,674.00

# Exhibit B Summary of Compensation by Professional

# SUMMARY OF COMPENSATION BY PROFESSIONAL

Name of Professional	Position / Year Admitted to Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979	\$1,500.00	20.3	\$30,450.00
Scott D. Gilbert	U.S. Court of Appeals for the District of Columbia – 1980	\$1,500.00	20.5	\$30,430.00
	U.S. Court of Appeals for the District of Columbia – 1960 U.S. Court of International Trade - 1984			
	U.S. Supreme Court - 1987			
	U.S. District Court for the District of Columbia – 2008			
	Cherokee Nation - 2017			
	U.S. Court of Federal Claims - 2019			
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000	\$950.00	33.6	\$31,920.00
	District of Columbia – 2006	*****		, , , , , , , , , ,
	U.S. Court of Appeals for the Third Circuit – 2009			
Richard Shore	Partner / State of New York – 1988	\$1,200.00	39.5	\$47,400.00
	District of Columbia – 1989			
	U.S. Court of Appeals for the Third Circuit – 2009			
	U.S. Court of Appeals for the Fourth Circuit – 2014			
	U.S. Court of Appeals for the Ninth Circuit – 2014			
	U.S. Court of Appeals for the Fifth Circuit – 2017			
	Cherokee Nation – 2017			
Craig J. Litherland	Partner / State of Texas – 1983	\$1,250.00	6.1	\$7,625.00
	Supreme Court of Texas – 1983			
	U.S. Court of Appeals Fifth Circuit – 1984			
	U.S. District Court for the Southern District of Texas – 1985			
	U.S. Federal Court for the Eastern District of Michigan – 1995			
	District of Columbia - 2001			
	U.S. District Court for the Western District of Texas – 2008			
D' 1 11 '1	Cherokee Nation – 2017	Φ1 <b>25</b> 0 00	0.7	£10.075.00
Richard Leveridge	Partner / District of Columbia – 1981	\$1,250.00	8.7	\$10,875.00
Inna Hudan	State of New York - 1997	\$675.00	56.0	\$29.407.50
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010	\$675.00	56.9	\$38,407.50
	District of Columbia - 2011			
	U.S. District Court for the District of Maryland – 2011			
	U.S. Court of Appeals for the First Circuit – 2015			
	U.S. Supreme Court - 2016			
	Cherokee Nation – 2017			
	U.S. District Court for the District of Columbia - 2019			
Monique Abrishami	Of Counsel / State of Florida – 2009	\$640.00	20.4	\$13,056.00
Tribinique i Ionibilation	District of Columbia - 2019	φσ.σ.σσ		\$12,020.00
Mike Rush	Of Counsel / State of Delaware – 2007	\$640.00	23.4	\$14,976.00
	District of Columbia 2017		<i>-</i>	. ,
Emily Grim	Associate / Commonwealth of Pennsylvania – 2010	\$600.00	18.6	\$11,160.00
	State of Illinois – 2010			ŕ
	District of Columbia – 2012			
	U.S. District Court for the District of Columbia - 2016			
	U.S. Court of Federal Claims – 2020			

Name of Professional	Position / Year Admitted to Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees
Daniel Wolf	Associate / State of New York – 2011	\$600.00	14.3	\$8,580.00
Bullet Well	District of Columbia – 2013	\$000.00	15	ψο,Σου.σο
	Southern District of New York – 2011			
	U.S. Court of Appeals for the Ninth Circuit – 2012			
Benjamin Massarsky	Associate / New York – 2011	\$500.00	30.5	\$15,250.00
	District of Columbia – 2012	400000		4-0,-0000
	U.S. District Court for the District of Columbia – 2012			
	Maryland - 2016			
Jasmine Chalashtori	Associate / Commonwealth of Virginia – 2016	\$380.00	22.5	\$8,550.00
	District of Columbia – 2017			ŕ
	State of Maryland – 2017			
Sarah Sraders	Associate / State of New York – 2016	\$380.00	15.5	\$5,890.00
	District of Columbia – 2017			
Christian Carey	Associate / District of Columbia - 2020	\$380.00	21.3	\$8,094.00
John Girgenti	Staff Attorney / State of New York – 2002	\$335.00	42.6	\$14,271.00
	District of Columbia – 2007			
Rachael Lyle	Staff Attorney / State of Alabama – 2017	\$305.00	49.9	\$15,219.50
	District of Columbia - 2018			
Lauren Fastenau	Paralegal – Joined firm in 2019	\$300.00	11.4	\$3,420.00
Alyssa Bonesteel	Paralegal – Joined firm in 2018	\$225.00	10.6	\$2,385.00
Katherine Johnson	Paralegal – Joined firm in 2018	\$225.00	26.6	\$5,985.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$225.00	9.1	\$2,047.50
Sara Ogrey	Project Assistant – Joined firm in 2019	\$190.00	10.5	\$1,995.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$275.00	7.7	\$2,117.50
	Totals		500.0	\$299,674.00
	Attorney Blended Rate	\$664.29		
	Paraprofessional Blended Rate	\$236.50		

# Exhibit C Summary of Expenses Incurred

# SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Lexis	\$122.40
PACER	\$164.80
Westlaw	\$2,463.69
	\$2,750.89

# Exhibit D

**Time and Expense Detail** 

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GilbertLegal.com

October 6, 2020

Invoice Number: 11320855 Client Number: 1599

Tax ID:

52-2283869

Ad Hoc Committee c/o Marshall S. Huebner Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017

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#### FOR PROFESSIONAL SERVICES RENDERED through July 31, 2020

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy Total	299,674.00 <b>299,674.00</b>	2,750.89 <b>2,750.89</b>	302,424.89 <b>302,424.89</b>
	TOTA	AL FEES	\$ 299,674.00
	TOTAL EXI	PENSES	\$ 2,750.89
	TOTAL FEES AND EXI	PENSES	\$ 302,424.89



# FOR PROFESSIONAL SERVICES RENDERED through July 31, 2020

#### **Purdue Bankruptcy**

#### A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Gilbert, S.	7/01/20	Confer with S. Birnbaum re insurance issues.	.50	750.00
Gilbert, S.	7/01/20	Confer with C. Litherland, K. Quinn, and J. Hudson re Document E strategy.	.60	900.00
Quinn, K.	7/01/20	Confer with team re Document E standards.	.70	665.00
Quinn, K.	7/01/20	Review Second Circuit Document E standard.	.40	380.00
Quinn, K.	7/01/20	Confer with S. Gilbert, C. Litherland and J. Hudson re potential for Document E.	.60	570.00
Shore, R.	7/01/20	Confer with R. Leveridge, K. Quinn, J. Hudson, and C. Litherland re strategy for asset recovery focused on Document E.	.70	840.00
Shore, R.	7/01/20	Draft outline of agreed approach re Document A (0.5); communicate with J. Hudson re S. Hanson (UCC) inquiry re Document A (0.2).	.70	840.00
Litherland, C.	7/01/20	Confer with R. Shore, K. Quinn, J. Hudson, and R. Leveridge re issues related to roles in Document A.	.70	875.00
Litherland, C.	7/01/20	Confer with S. Gilbert, K. Quinn, and J. Hudson re coordination among public entities in connection with Document A.	.60	750.00
Hudson, J.	7/01/20	Review strategy for Document E.	.50	337.50
Hudson, J.	7/01/20	Confer with C. Litherland, K. Quinn, R. Shore and R. Leveridge re next steps for insurance strategy.	.70	472.50
Hudson, J.	7/01/20	Confer with S. Gilbert, K. Quinn, and C. Litherland re Document E.	.60	405.00
Abrishami, M.	7/01/20	Analyze legal issues concerning Document A.	1.20	768.00
Abrishami, M.	7/01/20	Revise memorandum re Insurance Issue #47.	1.80	1,152.00
Leveridge, R.	7/01/20	Analyze strategy for asset recovery (1.0); review briefing on related issue (0.4); confer with R. Shore, K. Quinn, J. Hudson, and C. Litherland re same (0.7).	2.10	2,625.00
Chalashtori, J.	7/01/20	Correspond with M. Abrishami re memorandum re Insurance Issue #47.	.20	76.00
Shore, R.	7/02/20	Communicate with S. Gilbert and others re Document A strategy.	.50	600.00

Name	Date	Services	Hours	Amount
Litherland, C.	7/02/20	Communicate with S. Gilbert, J. Hudson and others re requirements for participation in Document A proceedings.	.10	125.00
Hudson, J.	7/02/20	Communicate with S. Roitman, S. Birnbaum, and S. Gilbert re insurance strategy.	.10	67.50
Hudson, J.	7/02/20	Confer with M. Abrishami re analysis of Insurance Issue #43.	.20	135.00
Hudson, J.	7/02/20	Begin drafting Document E.	5.20	3,510.00
Hudson, J.	7/02/20	Review exhibits to Documents B and C.	.20	135.00
Wolf, D.	7/02/20	Revise correspondence re insurance coverage.	.50	300.00
Rush, M.	7/02/20	Research in connection with Document A.	2.50	1,600.00
Rush, M.	7/02/20	Draft exhibits in connection with Document B.	2.60	1,664.00
Abrishami, M.	7/02/20	Revise memorandum re Insurance Issue #47.	.10	64.00
Abrishami, M.	7/02/20	Confer with J. Chalashtori re Insurance Issue #47 memorandum.	.30	192.00
Abrishami, M.	7/02/20	Analyze legal issues concerning Document A.	.10	64.00
Abrishami, M.	7/02/20	Revise memorandum re Insurance Issue #46.	1.90	1,216.00
Abrishami, M.	7/02/20	Revise memorandum re Insurance Issues #42 and #43.	.10	64.00
Abrishami, M.	7/02/20	Confer with J. Hudson re memoranda concerning Insurance Issues #42, #43, #46, and #47.	.20	128.00
Abrishami, M.	7/02/20	Revise Document E.	1.40	896.00
Gilbert, S.	7/03/20	Confer with K. Quinn re strategy.	.50	750.00
Quinn, K.	7/03/20	Confer with S. Gilbert re status and strategy.	.50	475.00
Hudson, J.	7/03/20	Revise Document E.	1.00	675.00
Abrishami, M.	7/03/20	Revise memorandum re Insurance Issue #47.	.60	384.00
Abrishami, M.	7/03/20	Revise Document E.	.30	192.00
Chalashtori, J.	7/03/20	Confer with M. Abrishami re Insurance Issue #47.	.30	114.00
Shore, R.	7/05/20	Revise and provide comments on Document A (1.2); review draft Document A (1.0); communicate with J. Hudson and R. Leveridge re revised Document F (0.3).	2.50	3,000.00
Shore, R.	7/05/20	Revise Document E.	1.00	1,200.00
Hudson, J.	7/05/20	Revise Document E.	.80	540.00
Hudson, J.	7/05/20	Review revisions to exhibits to Documents B and C.	.10	67.50
Grim, E.	7/05/20	Communicate with S. Gilbert and J. Hudson re new issue relating to insurance strategy.	.30	180.00
Leveridge, R.	7/05/20	Review material from J. Hudson re insurance recovery.	.50	625.00
Gilbert, S.	7/06/20	Confer with team re insurance strategy.	.60	900.00

Name	Date	Services	Hours	Amount
Quinn, K.	7/06/20	Confer with team re insurance strategy and timing.	.60	570.00
Quinn, K.	7/06/20	Confer with K. Maclay re insurance presentation to MSGE group.	.40	380.00
Shore, R.	7/06/20	Analyze strategy and next steps re finalizing Document C, Document F and Document A.	.90	1,080.00
Shore, R.	7/06/20	Review revised draft of Document C.	.10	120.00
Shore, R.	7/06/20	Communicate with J. Hudson re comments on Document A.	.50	600.00
Shore, R.	7/06/20	Confer with S. Gilbert and others re insurance strategy.	.60	720.00
Shore, R.	7/06/20	Confer with J. Hudson re Document A.	.20	240.00
Shore, R.	7/06/20	Confer with D. Wolf re D&O in Document B.	.20	240.00
Hudson, J.	7/06/20	Provide comments to draft of Documents B and C, including exhibits.	.30	202.50
Hudson, J.	7/06/20	Confer with S. Gilbert, R. Shore, R. Leveridge, K. Quinn, and E. Grim re Document E.	.60	405.00
Hudson, J.	7/06/20	Revise Document E.	1.10	742.50
Hudson, J.	7/06/20	Revise insurance strategy, including re Document E.	.70	472.50
Hudson, J.	7/06/20	Confer with D. Molton re Document E strategy.	.10	67.50
Hudson, J.	7/06/20	Communicate with M. Rush, M. Abrishami, and D. Wolf on insurance strategy	.10	67.50
Grim, E.	7/06/20	Confer with S. Gilbert, R. Shore, K. Quinn, R. Leveridge, and J. Hudson re insurance recovery strategy.	.60	360.00
Wolf, D.	7/06/20	Revise documents re insurance coverage strategy.	1.20	720.00
Rush, M.	7/06/20	Revise Document B exhibits.	2.60	1,664.00
Massarsky, B.	7/06/20	Review recent uploads to Intralinks website re relevance to insurance coverage issues.	.40	200.00
Johnson, K.	7/06/20	Review and categorize 600+ documents by insurance coverage lines (sixth set of 100 documents).	2.20	495.00
Abrishami, M.	7/06/20	Revise Document C.	.70	448.00
Bonesteel, A.	7/06/20	Review insurance policies and note claims notifications addresses and/or process.	5.00	1,125.00
Leveridge, R.	7/06/20	Analyze insurance recovery strategy.	1.40	1,750.00
Leveridge, R.	7/06/20	Confer with S. Gilbert, K. Quinn, E. Grim, R. Shore, and J. Hudson re insurance recovery strategy.	.60	750.00
Fastenau, L.	7/06/20	Review insurance policies and note claims notifications addresses and/or process.	4.70	1,410.00

Name	Date	Services	Hours	Amount
Sraders, S.	7/06/20	Review documents relevant to drafting Document E.	2.50	950.00
Shore, R.	7/07/20	Communications with D. Molton, R. Leveridge, and J. Hudson re procedural question re insurance recovery plans.	.40	480.00
Shore, R.	7/07/20	Confer with D. Molton, G. Cicero, J. Hudson, and R. Leveridge re Document E strategy.	.30	360.00
Hudson, J.	7/07/20	Confer with D. Molton, G. Cicero, R. Shore and R. Leveridge re Document E strategy.	.30	202.50
Hudson, J.	7/07/20	Communicate with Debtors, UCC and AHC re insurance strategy session.	.20	135.00
Hudson, J.	7/07/20	Communicate with A. Preis re Documents B and C.	.10	67.50
Hudson, J.	7/07/20	Revise draft of Documents B and C, including exhibits.	2.10	1,417.50
Hudson, J.	7/07/20	Review support for revisions to Section 6a of Document A.	.30	202.50
Rush, M.	7/07/20	Review insurance policies for notice provisions.	4.00	2,560.00
Massarsky, B.	7/07/20	Review recent uploads to Intralinks site re relevance to insurance coverage issues.	.40	200.00
Massarsky, B.	7/07/20	Review Bermuda products coverage.	.60	300.00
Johnson, K.	7/07/20	Continue to review new set of incoming documents from online database for insurance-related material.	1.80	405.00
Johnson, K.	7/07/20	Review, analyze and categorize 600+ documents by insurance coverage lines (sixth set of 100 documents).	.40	90.00
Abrishami, M.	7/07/20	Revise Insurance Issue #46 memorandum.	.30	192.00
Lyle, R.	7/07/20	Research claims communications processes for purposes of Kemper/Lumbermens discussions.	.90	274.50
Leveridge, R.	7/07/20	Confer with D. Molton, G. Cicero, R. Shore, and J. Hudson re procedural question re insurance recovery plans.	.30	375.00
Carey, C.	7/07/20	Draft research memorandum re Insurance Issue #37.	3.50	1,330.00
Carey, C.	7/07/20	Analyze plan provisions re Insurance Issue #37.	4.20	1,596.00
Carey, C.	7/07/20	Communicate with E. Grim re Insurance Issue #37.	.70	266.00
Sraders, S.	7/07/20	Research re Insurance Issue #46.	1.40	532.00
Sraders, S.	7/07/20	Confer with B. Massarsky and K. Johnson re document review.	.30	114.00
Sraders, S.	7/07/20	Communicate with M. Abrishami re outstanding questions re Insurance Issue #46.	.20	76.00
Gilbert, S.	7/08/20	Confer with Debtors and team re insurance strategy.	.50	750.00

Name	Date	Services	Hours	Amount
Quinn, K.	7/08/20	Confer with Debtors, UCC and team re insurance recovery strategy.	.50	475.00
Shore, R.	7/08/20	Confer with S. Birnbaum, A. Kramer, A. Pries, S. Gilbert, D. Wolf, and additional co-counsel re insurance coverage analysis.	.50	600.00
Shore, R.	7/08/20	Confer with J. Hudson re call with Debtors and next steps.	.20	240.00
Hudson, J.	7/08/20	Draft list of follow-up factual questions to Debtors re Document A.	.50	337.50
Hudson, J.	7/08/20	Finalize draft of Documents B and C, including exhibits.	2.20	1,485.00
Hudson, J.	7/08/20	Prepare for insurance strategy call with Debtors, UCC, and Ad Hoc Committee.	.30	202.50
Hudson, J.	7/08/20	Telephone call with Debtors, UCC, and Ad Hoc Committee re insurance strategy.	.50	337.50
Hudson, J.	7/08/20	Confer with R. Shore re strategy post-call with Debtors, UCC, and Ad Hoc Committee re insurance.	.20	135.00
Hudson, J.	7/08/20	Confirm updates to coverage charts.	.10	67.50
Hudson, J.	7/08/20	Revise Document A.	.10	67.50
Hudson, J.	7/08/20	Review draft of Document F.	.20	135.00
Wolf, D.	7/08/20	Confer with S. Birnbaum, A. Kramer, A. Pries, S. Gilbert, R. Shore, and additional co-counsel re insurance coverage analysis.	.50	300.00
Johnson, K.	7/08/20	Review search terms and plan for reviewing incoming documents re insurance material.	1.20	270.00
Johnson, K.	7/08/20	Review and categorize 600+ documents by insurance coverage lines (sixth set of 100 documents).	.60	135.00
Johnson, K.	7/08/20	Continue to review new documents from online database for insurance related material using Purdue insurer search terms.	2.20	495.00
Leveridge, R.	7/08/20	Review communications to A. Kramer re factual inquiry relating to insurance recovery efforts; communication with J. Hudson re same.	.30	375.00
Shore, R.	7/09/20	Communicate with R. Leveridge and J. Hudson re Document F.	.10	120.00
Shore, R.	7/09/20	Review draft Document F.	.30	360.00
Hudson, J.	7/09/20	Confer with D. Molton and G. Cicero re Document F.	.10	67.50
Hudson, J.	7/09/20	Revise Document A based on discussions with Debtors and UCC (0.4); confer with team re same (0.7)	1.20	810.00

Name	Date	Services	Hours	Amount
Hudson, J.	7/09/20	Revise Document F.	.20	135.00
Hudson, J.	7/09/20	Communicate with R. Leveridge and R. Shore re Document F.	.10	67.50
Girgenti, J.	7/09/20	Confer with M. Abrishami, M. Rush, B. Massarsky and R. Lyle re research into Document A, Section 6.	.40	134.00
Wolf, D.	7/09/20	Confer with J. Hudson, M. Rush, M. Abrishami re documents pertaining to insurance coverage.	.70	420.00
Rush, M.	7/09/20	Revise Document A and related exhibits.	2.40	1,536.00
Rush, M.	7/09/20	Confer with team re Document A strategy (0.4); confer with J. Hudson, D. Wolf and M. Abrishami re same (0.7).	1.10	704.00
Massarsky, B.	7/09/20	Review recent uploads to Intralinks site re relevance to opioid insurance coverage.	.10	50.00
Massarsky, B.	7/09/20	Confer with M. Abrishami and others re research into Document A, Section 6.	.40	200.00
Abrishami, M.	7/09/20	Revise memorandum re Insurance Issue #46.	.80	512.00
Abrishami, M.	7/09/20	Confer with J. Hudson, D. Wolf, and M. Rush re Document A revisions.	.70	448.00
Abrishami, M.	7/09/20	Confer with M. Rush, B. Massarsky, J. Girgenti, and R. Lyle re Document A revisions.	.40	256.00
Abrishami, M.	7/09/20	Review Exhibit A to Document A.	.10	64.00
Lyle, R.	7/09/20	Confer with M. Abrishami, M. Rush, B. Massarsky, and J. Girgenti re policy analysis.	.40	122.00
Leveridge, R.	7/09/20	Review and revise materials re insurance recovery.	.90	1,125.00
Chalashtori, J.	7/09/20	Correspond with M. Abrishami re Insurance Issue #47 memorandum.	.20	76.00
Ogrey, S.	7/09/20	Update MDL and non-MDL portions of cases master tracking sheet for purposes of insurance analysis.	.80	152.00
Ogrey, S.	7/09/20	Review Milbank documents for insurance-related materials for purposes of insurance analysis.	3.70	703.00
Fastenau, L.	7/09/20	Update MDL and non-MDL portions of cases master tracking sheet.	.80	240.00
Sraders, S.	7/09/20	Revise memorandum re Insurance Issue #46.	2.30	874.00
Shore, R.	7/10/20	Confer with J. Hudson re insurance recovery strategy.	.30	360.00
Shore, R.	7/10/20	Revise Document F.	.30	360.00
Hudson, J.	7/10/20	Review and revise Document A.	.70	472.50
Hudson, J.	7/10/20	Confer with R. Shore re insurance recovery strategy.	.30	202.50
Hudson, J.	7/10/20	Begin outlining template of Document G.	.20	135.00

Name	Date	Services	Hours	Amount
Hudson, J.	7/10/20	Continue revising Document F.	.40	270.00
Girgenti, J.	7/10/20	Communications with J. Hudson, M. Abrishami, D. Wolf, A. Gaske, B. Massarsky, and R. Lyle re revisions to Document A.	.20	67.00
Girgenti, J.	7/10/20	Revise spreadsheet re analysis of research for Document A, Section 6.	2.10	703.50
Girgenti, J.	7/10/20	Review and analyze insurance policies related to research for Document A, Section 6.	1.90	636.50
Martinez, S.	7/10/20	Cite check memorandum re Insurance Issue #46.	1.60	360.00
Johnson, K.	7/10/20	Continue to review documents from online database for insurance related material using previously agreed upon Purdue insurer search terms.	1.30	292.50
Lyle, R.	7/10/20	Communicate with J. Girgenti and M. Rush re research into Document A, Section 6.	.10	30.50
Ogrey, S.	7/10/20	Continue to review Milbank documents for insurance-related materials.	5.00	950.00
Sraders, S.	7/10/20	Revise memorandum re Insurance Issue #46.	.90	342.00
Quinn, K.	7/13/20	Correspond with co-counsel re K. Maclay letter.	.30	285.00
Hudson, J.	7/13/20	Outline next steps for Document G.	.10	67.50
Hudson, J.	7/13/20	Revise Document F.	.70	472.50
Girgenti, J.	7/13/20	Revise spreadsheet re analysis of research for Document A, Section 6.	3.20	1,072.00
Girgenti, J.	7/13/20	Review and analyze insurance policies re research related to Document A, Section 6.	3.40	1,139.00
Girgenti, J.	7/13/20	Communications with M. Abrishami, M. Rush, B. Massarsky, and R. Lyle re update on research for Document A, Section 6.	.10	33.50
Martinez, S.	7/13/20	Finalize cite checking memorandum re Insurance Issue #46.	2.80	630.00
Massarsky, B.	7/13/20	Review insurance policies re revisions to Document A, Section 6.	4.20	2,100.00
Lyle, R.	7/13/20	Research in support of Document A, Section 6.	8.40	2,562.00
Chalashtori, J.	7/13/20	Continue research re Insurance Issue #47.	3.30	1,254.00
Chalashtori, J.	7/13/20	Revise memorandum re Insurance Issue #47.	1.70	646.00
Ogrey, S.	7/13/20	Finish reviewing Milbank documents for insurance-related materials.	1.00	190.00
Shore, R.	7/14/20	Confer with J. Hudson and R. Leveridge re insurance strategy.	.60	720.00
Shore, R.	7/14/20	Review and revise current draft of Document F.	1.00	1,200.00
Litherland, C.	7/14/20	Review draft of Document F.	.30	375.00

Name	Date	Services	Hours	Amount
Hudson, J.	7/14/20	Confer with R. Shore and R. Leveridge re insurance strategy.	.60	405.00
Hudson, J.	7/14/20	Confer with M. Abrishami re Section 3 of Document A.	.10	67.50
Hudson, J.	7/14/20	Communicate with A. Kramer re outstanding questions for Document A.	.10	67.50
Hudson, J.	7/14/20	Revise Document F.	.30	202.50
Hudson, J.	7/14/20	Communicate with S. Gilbert re insurance strategy.	.10	67.50
Girgenti, J.	7/14/20	Revise spreadsheet re analysis of research for Document A, Section 6.	1.20	402.00
Girgenti, J.	7/14/20	Review insurance policies with regard to research into Document A, Section 6.	1.30	435.50
Massarsky, B.	7/14/20	Review insurance policies re revisions to Document A, Section 6.	3.40	1,700.00
Johnson, K.	7/14/20	Continue to review documents from online database for insurance related material using previously agreed upon Purdue insurer search terms.	2.20	495.00
Abrishami, M.	7/14/20	Revise memorandum re Insurance Issue #46.	.30	192.00
Abrishami, M.	7/14/20	Confer with J. Hudson re Document A.	.10	64.00
Abrishami, M.	7/14/20	Revise Document A.	.30	192.00
Lyle, R.	7/14/20	Research in support of Document A, Section 6.	8.80	2,684.00
Leveridge, R.	7/14/20	Confer with R. Shore and J. Hudson re status of insurance recovery efforts and next steps.	.60	750.00
Sraders, S.	7/14/20	Revise memorandum re Insurance Issue #46.	.60	228.00
Sraders, S.	7/14/20	Research re Document A, Section 3.	.50	190.00
Hudson, J.	7/15/20	Communicate with A. Kramer and M. Rush re attachments to Documents B and C.	.10	67.50
Girgenti, J.	7/15/20	Confer with B. Massarsky and R. Lyle re document review project.	.30	100.50
Girgenti, J.	7/15/20	Draft chart re insurance-related documents review.	.80	268.00
Girgenti, J.	7/15/20	Review and analyze documents for insurance-related materials.	.90	301.50
Wolf, D.	7/15/20	Review underwriting materials and historic correspondence with insurers.	2.00	1,200.00
Rush, M.	7/15/20	Review analysis re Document A.	3.20	2,048.00
Martinez, S.	7/15/20	Review and revise place of incorporation and domicile information re Debtors and subsidiaries.	.20	45.00
Martinez, S.	7/15/20	Review and organize foreign insurer policies issued to Debtors' entities.	.80	180.00

Name	Date	Services	Hours	Amount
Massarsky, B.	7/15/20	Review insurance policies re revisions to Document A, Section 6.	1.60	800.00
Massarsky, B.	7/15/20	Review Bermuda form insurance case research.	.40	200.00
Massarsky, B.	7/15/20	Revise insurance policy summaries re revisions to Document A, Section 6.	1.50	750.00
Massarsky, B.	7/15/20	Confer with K. Johnson re status of insurance application review project.	.40	200.00
Massarsky, B.	7/15/20	Confer with R. Lyle and J. Girgenti re analysis of insurance underwriting materials.	.30	150.00
Johnson, K.	7/15/20	Confer with B. Massarsky re underwriting documents.	.40	90.00
Johnson, K.	7/15/20	Finalize analysis and categorization of 600+ documents by insurance coverage lines (Aon).	2.70	607.50
Abrishami, M.	7/15/20	Correspond with J. Hudson, M. Rush, D. Wolf, B. Massarsky, and R. Lyle re revisions to Document A, Section 6.	.20	128.00
Abrishami, M.	7/15/20	Revise Insurance Issue #47 memorandum.	.10	64.00
Lyle, R.	7/15/20	Revise summary of research into Document A, Section 6.	.80	244.00
Lyle, R.	7/15/20	Analyze insurance application and underwriting materials; confer with B. Massarsky and J. Girgenti re same.	.50	152.50
Chalashtori, J.	7/15/20	Continue research re Insurance Issue #47.	3.80	1,444.00
Chalashtori, J.	7/15/20	Draft memorandum re Insurance Issue #47.	3.90	1,482.00
Fastenau, L.	7/15/20	Analyze cases tracking sheets and calculate number of claims and jurisdictions for purposes of insurance analysis.	1.10	330.00
Hudson, J.	7/16/20	Confer with R. Lyle, B. Massarsky, and J. Girgenti re review of additional underwriting evidence.	.30	202.50
Girgenti, J.	7/16/20	Confer with J. Hudson, B. Massarsky and R. Lyle re document review project.	.30	100.50
Girgenti, J.	7/16/20	Revise chart re review of application and underwriting documents.	2.30	770.50
Girgenti, J.	7/16/20	Review and analyze re application and underwriting documents.	2.40	804.00
Martinez, S.	7/16/20	Cite check memorandum re Insurance Issue #47.	3.70	832.50
Massarsky, B.	7/16/20	Analyze recent uploads to Intralinks site re relevance to insurance coverage issues.	.50	250.00
Massarsky, B.	7/16/20	Review summary of underwriting materials re analysis of relevance to insurance coverage issues.	.10	50.00
Massarsky, B.	7/16/20	Confer with review team re analysis of insurance underwriting materials.	.30	150.00

Name	Date	Services	Hours	Amount
Johnson, K.	7/16/20	Finalize analysis and categorization of 600+ documents by insurance coverage lines (Aon, Marsh, and Unknown Insurer).	6.10	1,372.50
Bonesteel, A.	7/16/20	Cite check memorandum re Insurance Issue #47.	3.00	675.00
Lyle, R.	7/16/20	Confer with J. Hudson, B. Massarsky, and J. Girgenti re analysis of insurance application and underwriting materials.	.30	91.50
Lyle, R.	7/16/20	Additional research re Document A, Section 6.	1.10	335.50
Chalashtori, J.	7/16/20	Continue revising memorandum re Insurance Issue #47.	1.60	608.00
Fastenau, L.	7/16/20	Revise citations in memorandum re Insurance Issue #47.	3.10	930.00
Hudson, J.	7/17/20	Correspond with Debtors re following up on insurance-related requests.	.30	202.50
Girgenti, J.	7/17/20	Revise chart re review of application and underwriting documents.	3.60	1,206.00
Girgenti, J.	7/17/20	Review and analyze application and underwriting documents.	3.80	1,273.00
Grim, E.	7/17/20	Communicate with D. Molton and L. Fogelman re financial presentations.	.30	180.00
Massarsky, B.	7/17/20	Draft template for insurance application and underwriting review project.	.40	200.00
Massarsky, B.	7/17/20	Analyze insurance application underwriting documents.	1.20	600.00
Johnson, K.	7/17/20	Finalize review of documents from online database for insurance related material using previously agreed upon search terms.	2.60	585.00
Lyle, R.	7/17/20	Analyze insurance application and underwriting materials.	1.70	518.50
Chalashtori, J.	7/17/20	Finalize memorandum re Insurance Issue #47.	.50	190.00
Sraders, S.	7/17/20	Research re Insurance Issue #46.	.40	152.00
Hudson, J.	7/19/20	Draft memorandum setting forth conclusions on Insurance Issue #17.	2.10	1,417.50
Shore, R.	7/20/20	Confer with J. Hudson and D. Wolf re revised memorandum re Insurance Issue #17.	.60	720.00
Shore, R.	7/20/20	Revise J. Hudson memorandum re Insurance Issue #17.	2.00	2,400.00
Hudson, J.	7/20/20	Confer with R. Shore and D. Wolf re insurance strategy.	.60	405.00
Hudson, J.	7/20/20	Revise memorandum setting forth conclusions on Insurance Issue #17.	3.50	2,362.50

Name	Date	Services	Hours	Amount
Girgenti, J.	7/20/20	Revise chart re review of application and underwriting documents.	3.10	1,038.50
Girgenti, J.	7/20/20	Review and analyze application and underwriting documents.	3.20	1,072.00
Wolf, D.	7/20/20	Review general liability policies and revise memorandum re Insurance Issue #17.	1.10	660.00
Wolf, D.	7/20/20	Confer with R. Shore and J. Hudson re coverage analysis re Insurance Issue #17.	.60	360.00
Massarsky, B.	7/20/20	Analyze insurance application underwriting documents.	4.00	2,000.00
Bonesteel, A.	7/20/20	Review new documents produced for insurance- related materials.	1.60	360.00
Lyle, R.	7/20/20	Analyze insurance application and underwriting materials for products liability coverage.	4.60	1,403.00
Fastenau, L.	7/20/20	Analyze case tracking sheets and calculate number of personal injury claims as well as dates of most recent claims for insurance analysis.	.70	210.00
Sraders, S.	7/20/20	Follow-up research re Insurance Issue #46.	2.00	760.00
Gilbert, S.	7/21/20	Confer with K. Quinn, R. Shore, J. Hudson and D. Wolf re insurance strategy.	.50	750.00
Quinn, K.	7/21/20	Confer with S. Gilbert, R. Shore, J. Hudson and D. Wolf next steps in insurance strategy.	.50	475.00
Shore, R.	7/21/20	Confer with R. Leveridge and J. Hudson re status, strategy, next steps (0.6); confer with S. Gilbert, K. Quinn, and others re insurance strategy (0.5); confer with D. Wolf and J. Hudson re same (0.3).	1.40	1,680.00
Shore, R.	7/21/20	Review and revise memorandum re Insurance Issue #17.	2.50	3,000.00
Shore, R.	7/21/20	Communicate with Akin re next steps.	1.00	1,200.00
Hudson, J.	7/21/20	Review status of insurance analysis.	.50	337.50
Hudson, J.	7/21/20	Confer with A. Kramer re Debtors' views on insurance coverage issues.	.20	135.00
Hudson, J.	7/21/20	Prepare for insurance strategy presentation to multistate group.	.20	135.00
Hudson, J.	7/21/20	Prepare for strategy call between Debtors, AHC, and UCC.	.10	67.50
Hudson, J.	7/21/20	Confer with S. Gilbert, K. Quinn, R. Shore, and D. Wolf re insurance strategy.	.50	337.50
Hudson, J.	7/21/20	Revise memorandum on Insurance Issue #17.	.80	540.00
Hudson, J.	7/21/20	Confer with R. Shore and R. Leveridge re impact of insurance review on strategy.	.60	405.00

Name	Date	Services	Hours	Amount
Grim, E.	7/21/20	Communicate with J. Hudson re issue relating to insurance valuation.	.20	120.00
Wolf, D.	7/21/20	Confer with R. Shore and J. Hudson re insurance coverage analysis re Insurance Issue #17.	.30	180.00
Wolf, D.	7/21/20	Confer with S. Gilbert, K. Quinn, R. Shore, and J. Hudson re coverage strategy and analysis.	.50	300.00
Rush, M.	7/21/20	Review research re parties for Document A.	4.30	2,752.00
Massarsky, B.	7/21/20	Analyze insurance application underwriting documents.	.30	150.00
Abrishami, M.	7/21/20	Research related to Document A.	.30	192.00
Lyle, R.	7/21/20	Continue analysis of insurance application and underwriting materials for products liability coverage.	1.10	335.50
Leveridge, R.	7/21/20	Confer with R. Shore and J. Hudson re insurance recovery strategy and open action items.	.60	750.00
Quinn, K.	7/22/20	Participate in creditors' joint financial presentation.	1.40	1,330.00
Shore, R.	7/22/20	Confer with A. Preis, D. Winscheffel, S. Hanson, S. Brauner, J. Hudson, and D. Wolf re insurance strategy.	.50	600.00
Hudson, J.	7/22/20	Confer with A. Preis, D. Winscheffel, S. Hanson, S. Brauner, R. Shore, and D. Wolf re insurance strategy.	.50	337.50
Hudson, J.	7/22/20	Review updates re insurance strategy.	.10	67.50
Grim, E.	7/22/20	Confer with all public and private creditor groups re Debtor financial analysis.	1.40	840.00
Grim, E.	7/22/20	Confer with all public creditor groups and DOJ re FTI/Houlihan financial analysis.	1.70	1,020.00
Wolf, D.	7/22/20	Confer with A. Preis, S. Hanson, R. Shore, and J. Hudson re general liability coverage.	.50	300.00
Massarsky, B.	7/22/20	Analyze recent uploads to Intralinks site re relevance to insurance coverage issues.	.20	100.00
Johnson, K.	7/22/20	Review and organize recently filed proofs of claim for purposes of insurance analysis.	.20	45.00
Shore, R.	7/23/20	Confer with S. Birnbaum, S. Roitman, and J. Hudson re insurance strategy.	.30	360.00
Shore, R.	7/23/20	Analyze insurance recovery options and strategy.	1.00	1,200.00
Hudson, J.	7/23/20	Confer with S. Birnbaum, S. Roitman, and R. Shore re insurance strategy.	.30	202.50
Hudson, J.	7/23/20	Prepare for insurance strategy discussion with S. Birnbaum, S. Roitman, and R. Shore.	.10	67.50
Hudson, J.	7/23/20	Summarize call with S. Birnbaum and S. Roitman for AHC team and UCC team re insurance strategy.	.40	270.00

Name	Date	Services	Hours	Amount
Hudson, J.	7/23/20	Analyze involvement of AmerisourceBergen in bankruptcy proceedings.	.20	135.00
Hudson, J.	7/23/20	Begin drafting template for Document G.	.40	270.00
Massarsky, B.	7/23/20	Analyze certain policy re Document A, Section 6.	.30	150.00
Abrishami, M.	7/23/20	Revise Document A.	1.10	704.00
Abrishami, M.	7/23/20	Revise memorandum re Insurance Issue #47.	1.50	960.00
Chalashtori, J.	7/23/20	Correspond with M. Abrishami re Insurance Issue #47 memorandum.	.20	76.00
Quinn, K.	7/24/20	Communicate with K. Maclay re MSGE insurance presentation.	.10	95.00
Shore, R.	7/24/20	Analyze strategy for Document F.	.80	960.00
Shore, R.	7/24/20	Communications with C. Litherland and J. Hudson re proper procedural mechanism for Document F.	1.00	1,200.00
Shore, R.	7/24/20	Review A. Preis note re issue related to Document E; communicate with A. Preis re same.	.30	360.00
Litherland, C.	7/24/20	Review issues related to Document F and outline thoughts on same.	.70	875.00
Litherland, C.	7/24/20	Communicate with R. Shore and J. Hudson re Document E v Document F.	.80	1,000.00
Hudson, J.	7/24/20	Analyze strategy for Document F.	.80	540.00
Hudson, J.	7/24/20	Revise draft template for Document G.	1.60	1,080.00
Hudson, J.	7/24/20	Analyze involvement of AmerisourceBergen in bankruptcy proceedings.	.20	135.00
Wolf, D.	7/24/20	Draft correspondence with D&O insurance carriers.	1.00	600.00
Abrishami, M.	7/24/20	Revise memorandum re Insurance Issue #47.	1.30	832.00
Abrishami, M.	7/24/20	Communicate with J. Chalashtori re revisions to Insurance Issue #47 memorandum.	.10	64.00
Lyle, R.	7/24/20	Continue analysis of insurance application and underwriting materials for products liability coverage.	7.40	2,257.00
Chalashtori, J.	7/24/20	Continue revising memorandum re Insurance Issue #47.	1.40	532.00
Sraders, S.	7/24/20	Research re specific insurers and Insurance Issue #46.	2.30	874.00
Quinn, K.	7/26/20	Correspond with A. Preis, S. Birnbaum and team re next steps.	.20	190.00
Quinn, K.	7/26/20	Communicate with team re MSGE insurance presentation.	.10	95.00
Hudson, J.	7/26/20	Prepare for presentation of insurance strategy to MSGE.	.10	67.50

Name	Date	Services	Hours	Amount
Hudson, J.	7/26/20	Communicate with Debtors and UCC re insurance strategy.	.30	202.50
Quinn, K.	7/27/20	Review proposed Document E.	.30	285.00
Quinn, K.	7/27/20	Correspond with MSGE group re insurance presentation.	.10	95.00
Shore, R.	7/27/20	Draft talking points for A. Kramer re initial letters.	1.00	1,200.00
Shore, R.	7/27/20	Review template of Document G.	.20	240.00
Shore, R.	7/27/20	Communicate with J. Hudson and S. Gilbert re preparation for call with Purdue.	.50	600.00
Shore, R.	7/27/20	Confer with D. Wolf re D&O issues.	.20	240.00
Hudson, J.	7/27/20	Communicate with multistate group re insurance strategy.	.10	67.50
Hudson, J.	7/27/20	Communicate with Debtors and UCC re insurance strategy.	.20	135.00
Hudson, J.	7/27/20	Review draft talking points for initial discussions with insurers.	.20	135.00
Hudson, J.	7/27/20	Revise draft template for Document G.	1.70	1,147.50
Hudson, J.	7/27/20	Prepare for July 28 call with Debtors and UCC re insurance strategy.	.30	202.50
Wolf, D.	7/27/20	Revise correspondence to D&O insurers.	2.40	1,440.00
Massarsky, B.	7/27/20	Analyze recent uploads to Intralinks site re relevance to insurance coverage issues.	.50	250.00
Massarsky, B.	7/27/20	Analyze insurance application underwriting documents.	2.30	1,150.00
Abrishami, M.	7/27/20	Correspond with J. Hudson re agenda for July 28 telephone conference.	.10	64.00
Lyle, R.	7/27/20	Continue analysis of insurance application and underwriting materials.	5.40	1,647.00
Leveridge, R.	7/27/20	Review material re potential insurance recovery efforts.	.40	500.00
Sraders, S.	7/27/20	Communicate with E. Grim re Milbank document review.	.30	114.00
Gilbert, S.	7/28/20	Confer with S. Birnbaum and others re insurance strategy.	1.10	1,650.00
Shore, R.	7/28/20	Confer with J. Hudson and R. Leveridge re insurance strategy based on case developments.	.30	360.00
Shore, R.	7/28/20	Review insurer letter.	.50	600.00
Litherland, C.	7/28/20	Confer with S. Birnbaum, A. Kramer, A. Pries, R. Shore, and others re insurance litigation issues.	1.10	1,375.00
Hudson, J.	7/28/20	Confer with R. Shore and R. Leveridge re insurance strategy.	.30	202.50

Name	Date	Services	Hours	Amount
Hudson, J.	7/28/20	Revise Document G template.	.10	67.50
Hudson, J.	7/28/20	Prepare for insurance strategy discussion with Debtors and UCC.	.30	202.50
Hudson, J.	7/28/20	Prepare for insurance strategy presentation to MSGE.	.10	67.50
Hudson, J.	7/28/20	Review status of analysis of Insurance Issue #47.	.20	135.00
Hudson, J.	7/28/20	Analyze next steps for implementing insurance strategy.	.20	135.00
Hudson, J.	7/28/20	Attend insurance strategy meeting with Debtors and UCC.	1.10	742.50
Hudson, J.	7/28/20	Confer with A. Preis re Document C.	.10	67.50
Hudson, J.	7/28/20	Confirm facts re Insurance Issue #48.	.10	67.50
Hudson, J.	7/28/20	Analyze insurance strategy post-meeting with Debtors and UCC.	.60	405.00
Hudson, J.	7/28/20	Confer with C. Ricarte re Document F and Section 3 of Document A.	.10	67.50
Hudson, J.	7/28/20	Revise Document C.	.10	67.50
Girgenti, J.	7/28/20	Confer with B. Massarsky and R. Lyle re review of underwriting documents.	.50	167.50
Girgenti, J.	7/28/20	Revise chart re review of application and underwriting documents.	3.80	1,273.00
Girgenti, J.	7/28/20	Continue review and analysis of application and underwriting documents.	3.80	1,273.00
Massarsky, B.	7/28/20	Analyze documents relevant to Insurance Issue #47.	3.80	1,900.00
Massarsky, B.	7/28/20	Confer with R. Lyle and J. Girgenti re review of documents relevant to Insurance Issue #47.	.50	250.00
Massarsky, B.	7/28/20	Confer with R. Lyle re documents relevant to Insurance Issue #47.	.30	150.00
Abrishami, M.	7/28/20	Analyze Insurance Issue #47.	.10	64.00
Abrishami, M.	7/28/20	Review summary of July 28 telephone conference re policy review issues.	.10	64.00
Lyle, R.	7/28/20	Confer with B. Massarsky and J. Girgenti re documents relevant to Insurance Issue #47.	.50	152.50
Lyle, R.	7/28/20	Continue analysis of insurance application and underwriting materials.	6.70	2,043.50
Lyle, R.	7/28/20	Confer with B. Massarsky re analysis of insurance application and underwriting materials.	.30	91.50
Lyle, R.	7/28/20	Revise sections of analysis of insurance application and underwriting materials.	.90	274.50
Leveridge, R.	7/28/20	Confer with R. Shore and J. Hudson re insurance recovery discussions.	.60	750.00

Name	Date	Services	Hours	Amount
Chalashtori, J.	7/28/20	Correspond with team re research on Insurance Issue #48.	.20	76.00
Carey, C.	7/28/20	Research re Insurance Issue #48.	5.30	2,014.00
Carey, C.	7/28/20	Draft research memorandum re Insurance Issue #48.	2.30	874.00
Sraders, S.	7/28/20	Respond to questions from M. Abrishami re Insurance Issue #46.	.60	228.00
Gilbert, S.	7/29/20	Participate in insurance presentation to MSGE.	2.00	3,000.00
Quinn, K.	7/29/20	Participate in presentation of insurance strategy to MSGE (partial).	1.30	1,235.00
Shore, R.	7/29/20	Telephone conference with A. Kramer, M. Tobak, C. Ricarte, P. Breene, K. Benedict, S. Roitman, A. Preis, S. Birnbaum, B. Kaminetzky, C. Litherland, J. Hudson and M. Abrishami re Document A and Insurance Issue #47.	1.30	1,560.00
Shore, R.	7/29/20	Confer with S. Hanson, C. Litherland and J. Hudson re Insurance Issue #48 options.	.10	120.00
Shore, R.	7/29/20	Presentation to MSGE re insurance.	2.00	2,400.00
Shore, R.	7/29/20	Confer with representatives and counsel for Purdue re insurer letters, including prepare and follow up.	1.50	1,800.00
Shore, R.	7/29/20	Revise talking points and send to Purdue counsel; confer with A. Preis re same.	.50	600.00
Litherland, C.	7/29/20	Confer with S. Birnbaum, C. Ricarte, A. Preis, R. Shore, J. Hudson, B. Kaminetzky, A. Kramer and others re mechanisms for pursuit of insurance assets.	1.30	1,625.00
Litherland, C.	7/29/20	Confer with S. Hanson, R. Shore, and J. Hudson re timing of insurance claims.	.10	125.00
Hudson, J.	7/29/20	Prepare for discussion with Debtors and UCC re Insurance Issue #47 and Document F.	1.10	742.50
Hudson, J.	7/29/20	Attend discussion with Debtors and UCC re Insurance Issue #47 and Document F.	1.30	877.50
Hudson, J.	7/29/20	Prepare for insurance strategy presentation to MSGE.	.10	67.50
Hudson, J.	7/29/20	Present insurance strategy to MSGE.	2.00	1,350.00
Hudson, J.	7/29/20	Confer with S. Hanson, C. Litherland and R. Shore re options on Insurance Issue #48.	.10	67.50
Hudson, J.	7/29/20	Confer with D. Wolf re template of Document G.	.10	67.50
Hudson, J.	7/29/20	Communicate with K. Maclay re insurance strategy presentation to MSGE.	.10	67.50
Wolf, D.	7/29/20	Revise correspondence to insurers.	.50	300.00

Name	Date	Services	Hours	Amount
Wolf, D.	7/29/20	Confer with K. Maclay, D. Hegar, S. Sanford, S. Gilbert, R. Shore, and J. Hudson re insurance coverage analysis and strategy.	2.00	1,200.00
Abrishami, M.	7/29/20	Prepare for July 29 telephone conference re Insurance Issue #47.	1.00	640.00
Abrishami, M.	7/29/20	Telephone conference with A. Kramer, M. Tobak, C. Ricarte, P. Breene, K. Benedict, S. Roitman, A. Preis, S. Birnbaum, B. Kaminetzky, R. Shore, C. Litherland and J. Hudson re Document A and Insurance Issue #47.	1.30	832.00
Abrishami, M.	7/29/20	Confer with J. Hudson re Insurance Issue #47.	.40	256.00
Abrishami, M.	7/29/20	Review underwriting communications.	.40	256.00
Leveridge, R.	7/29/20	Communication with J. Hudson re call with Debtors' counsel re insurance recovery strategy.	.20	250.00
Chalashtori, J.	7/29/20	Correspond with team re research related to Insurance Issue #47.	.70	266.00
Chalashtori, J.	7/29/20	Begin reviewing communications re Insurance Issue #47.	.60	228.00
Fastenau, L.	7/29/20	Review and identify named policies and insurers for Insurance Issue #47.	1.00	300.00
Carey, C.	7/29/20	Follow-up research re Insurance Issue #48.	3.40	1,292.00
Carey, C.	7/29/20	Revise research memorandum re Insurance Issue #48.	1.90	722.00
Sraders, S.	7/29/20	Correspond with M. Abrishami re additional information re insurers and Insurance Issue #46.	.40	152.00
Gilbert, S.	7/30/20	Confer with team re insurance strategy.	.60	900.00
Gilbert, S.	7/30/20	Confer with A. Preis and others re insurance.	.50	750.00
Quinn, K.	7/30/20	Confer with team re strategic approach to filings.	.60	570.00
Quinn, K.	7/30/20	Follow up communications with team re Document F.	.30	285.00
Quinn, K.	7/30/20	Participate in call with A. Preis and insurance team re Document F and Debtors' perspective.	.50	475.00
Shore, R.	7/30/20	Confer with J. Hudson and D. Wolf re template demand letter.	.50	600.00
Shore, R.	7/30/20	Confer with team re insurer letter issues.	.60	720.00
Shore, R.	7/30/20	Revise draft talking points and send to Purdue.	.70	840.00
Shore, R.	7/30/20	Confer with Purdue re issues re insurer letter.	.50	600.00
Shore, R.	7/30/20	Confer with Akin re issues re insurer letter.	.40	480.00
Shore, R.	7/30/20	Revise letter to insurers.	2.00	2,400.00
Shore, R.	7/30/20	Confer with A. Kramer re letter to insurers.	.40	480.00

Name	Date	Services	Hours	Amount
Shore, R.	7/30/20	Confer with A. Preis and others re strategy related to insurer letter.	.50	600.00
Hudson, J.	7/30/20	Revise template Document G.	.20	135.00
Hudson, J.	7/30/20	Review research on Insurance Issue #48.	.10	67.50
Hudson, J.	7/30/20	Finalize template Document C.	.60	405.00
Hudson, J.	7/30/20	Revise Section 3 of Document A.	.20	135.00
Hudson, J.	7/30/20	Confer with A. Kramer, C. Ricarte, and R. Shore re Document C.	.40	270.00
Hudson, J.	7/30/20	Revise wording re Insurance Issue #C1 in Document C.	.50	337.50
Hudson, J.	7/30/20	Confer with R. Shore and D. Wolf re strategy for Document G.	.50	337.50
Hudson, J.	7/30/20	Confer with S. Gilbert, K. Quinn, and R. Shore re strategy based on discussions with Debtors and UCC.	.60	405.00
Hudson, J.	7/30/20	Prepare for insurance strategy discussion with S. Gilbert, K. Quinn, and R. Shore based on discussions with Debtors and UCC.	.10	67.50
Hudson, J.	7/30/20	Review update from A. Kramer re discussions with certain defendants.	.10	67.50
Hudson, J.	7/30/20	Revise Document F based on discussion with UCC.	1.10	742.50
Hudson, J.	7/30/20	Confer with A. Preis, S. Gilbert, K. Quinn and R. Shore re options for Document F.	.50	337.50
Wolf, D.	7/30/20	Confer with R. Shore and J. Hudson re correspondence with insurers.	.50	300.00
Rush, M.	7/30/20	Communications with K. Quinn re Document A strategy.	.70	448.00
Massarsky, B.	7/30/20	Analyze insurance application underwriting documents.	2.10	1,050.00
Abrishami, M.	7/30/20	Communicate with R. Leveridge re Document A.	.10	64.00
Abrishami, M.	7/30/20	Communicate with J. Chalashtori re Insurance Issue #47 research.	.10	64.00
Abrishami, M.	7/30/20	Confer with J. Hudson re Document A and Insurance Issue #47.	.20	128.00
Abrishami, M.	7/30/20	Analyze underwriting materials.	.30	192.00
Leveridge, R.	7/30/20	Communication with M. Abrishami re call with Debtors' counsel re insurance recovery efforts.	.20	250.00
Chalashtori, J.	7/30/20	Review various issues re Insurance Issue #47.	3.90	1,482.00
Quinn, K.	7/31/20	Confer with insurance team re draft Document F.	.30	285.00
Shore, R.	7/31/20	Review strategy for letters to insurers.	.50	600.00
Shore, R.	7/31/20	Revise Document F.	2.00	2,400.00

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Name	Date	Services	Hours	Amount
Litherland, C.	7/31/20	Revise Document F.	.40	500.00
Hudson, J.	7/31/20	Revise Document C to reflect passage of proof of claim deadline.	.20	135.00
Hudson, J.	7/31/20	Review legal authority for Document F	.10	67.50
Hudson, J.	7/31/20	Review initial insurer responses to Document C.	.10	67.50
Hudson, J.	7/31/20	Confer with A. Preis re approach to Document F.	.20	135.00
Hudson, J.	7/31/20	Revise Document F.	1.40	945.00
		Project Total:	436.90	\$ 245,905.00

#### **A003: Business Operations**

Name	Date	Services	Hours	Amount
Quinn, K.	7/01/20	Participate in presentation to tribal representatives re business plan.	1.30	1,235.00
Quinn, K.	7/10/20	Review correspondence and media re Debtors' political contributions.	.20	190.00
Quinn, K.	7/18/20	Confer with M. Diaz re financial presentation.	.20	190.00
Quinn, K.	7/21/20	Confer with M. Diaz re financial presentation.	.30	285.00
Quinn, K.	7/22/20	Participate in call with HHS re PBI/PHC issues.	1.80	1,710.00
		Project Total:	3.80	\$ 3,610.00

#### A004: Case Administration

Name	Date	Services	Hours	Amount
Gilbert, S.	7/03/20	Confer with AHC re class certification litigation.	1.00	1,500.00
Quinn, K.	7/03/20	Confer with E. Grim re task list and next steps.	.30	285.00
Quinn, K.	7/03/20	Participate in call with Debtors re response to class motions and timing of same.	.60	570.00
Quinn, K.	7/05/20	Review KL case update communication to AHC.	.30	285.00
Quinn, K.	7/12/20	Review communications re proposed class motions hearing.	.30	285.00
Quinn, K.	7/16/20	Review Florida filing re class motions.	.30	285.00
Quinn, K.	7/16/20	Review personal injury claimants response to class motions.	.20	190.00
Quinn, K.	7/20/20	Review correspondence from D. Simon re withdrawal of tribal class motion.	.10	95.00
Quinn, K.	7/22/20	Review pleadings re class cert motions.	1.00	950.00
Quinn, K.	7/22/20	Review PEC letter filing.	.30	285.00
Gilbert, S.	7/23/20	Attend bankruptcy court hearing on class certification motions.	3.20	4,800.00

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Name	Date	Services	Hours	Amount
Quinn, K.	7/23/20	Review agenda in advance of hearing.	.10	95.00
Quinn, K.	7/23/20	Attend hearing (by telephone) re class cert motions.	3.20	3,040.00
Grim, E.	7/23/20	Attend omnibus hearing re class certification motions and other issues.	3.20	1,920.00
Johnson, K.	7/31/20	Draft pro hac vice motions and orders for J. Hudson, M. Rush, R. Leveridge and R. Shore.	2.70	607.50
Bonesteel, A.	7/31/20	Revise pro hac motion M. Rush.	1.00	225.00
		Project Total:	17.80	\$ 15,417.50

#### A005: Claims Analysis

Name	Date	Services	Hours	Amount
Quinn, K.	7/01/20	Confer with S. Gilbert, R. Shore and others re process for claims filing and coordination with all governmental groups.	.50	475.00
Quinn, K.	7/10/20	Confer with D. Molton, S. Gilbert, S. Skikkos, and others re response to tribal class claim.	.50	475.00
Quinn, K.	7/10/20	Review letter from K. Maclay re POC consolidation.	.20	190.00
Quinn, K.	7/30/20	Review claims filings by governmental claimants.	.80	760.00
Sraders, S.	7/31/20	Research re claims brought by government entities.	.80	304.00
		Project Total:	2.80	\$ 2,204.00

#### A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	7/13/20	Draft second interim fee application and exhibits.	2.80	770.00
Holland, P.	7/13/20	Communicate with K. Quinn and E. Grim re 2nd interim fee application.	.20	55.00
Quinn, K.	7/14/20	Review and revise fee application.	.40	380.00
Holland, P.	7/14/20	Revise / finalize 2nd interim fee application and exhibits.	1.40	385.00
Holland, P.	7/14/20	Communicate with C. Gange @ KL re interim fee application.	.20	55.00
Holland, P.	7/15/20	Draft key to May 2020 time for US Trustee and Fee Examiner; communicate with E. Grim re same.	.90	247.50
Holland, P.	7/17/20	Revise key for May time; communicate with US Trustee and Fee Examiner re same and May LEDES file.	.40	110.00
Holland, P.	7/30/20	Draft June fee statement.	1.80	495.00
Grim, E.	7/30/20	Revise June fee application.	.60	360.00
		Project Total:	8.70	\$ 2,857.50

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Quinn, K.	7/02/20	Review client update.	.20	190.00
Gilbert, S.	7/06/20	Attend financial presentation to AHC re IACs.	1.00	1,500.00
Quinn, K.	7/06/20	Participate in diligence subcommittee call with FTI re later presentation.	.50	475.00
Quinn, K.	7/07/20	Confer with non-states re case update.	.60	570.00
Grim, E.	7/07/20	Confer with non-state clients, S. Gilbert, D. Molton, and R. Ringer re bar date issues and class certification motions by private creditor groups.	.60	360.00
Gilbert, S.	7/08/20	Attend AHC meeting re strategy related to class cert motions.	1.50	2,250.00
Quinn, K.	7/08/20	Participate in call with full Committee re status and strategy re class cert motions.	1.50	1,425.00
Grim, E.	7/08/20	Confer with AHC re strategy related to new class certification motions.	1.50	900.00
Gilbert, S.	7/15/20	Attend AHC meeting re Canadian class stipulation and class cert motions.	1.60	2,400.00
Quinn, K.	7/15/20	Participate in call with clients re class cert motions and Canadian stipulation.	1.60	1,520.00
Grim, E.	7/15/20	Confer with AHC re Canadian class stipulation and class certification motions.	1.60	960.00
Quinn, K.	7/29/20	Confer with AHC re update related to financial forecast, NAACP motion and omnibus hearing.	1.30	1,235.00
Grim, E.	7/29/20	Confer with AHC re updated financial forecast, NAACP motion, and outcome of omnibus hearing.	1.30	780.00
		Project Total:	14.80	\$ 14,565.00

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	7/01/20	Confer with TDP group re negotiations with A. Andrews.	.70	1,050.00
Quinn, K.	7/01/20	Participate in working group call re A. Andrews call.	.70	665.00
Grim, E.	7/01/20	Confer with TDP subcommittee re negotiations with personal injury claimants.	.70	420.00
Grim, E.	7/02/20	Review data relating to personal injury claims for purposes of TDP.	.20	120.00
Gilbert, S.	7/07/20	Meet with TDP group re analysis of personal injury claims.	.60	900.00

Name	Date	Services	Hours	Amount
Quinn, K.	7/07/20	Meet with TDP working group re analysis of personal injury claims.	.60	570.00
Grim, E.	7/07/20	Confer with TDP subcommittee re analysis of personal injury claims.	.60	360.00
Grim, E.	7/08/20	Research legal issues relevant to TDP negotiations.	.40	240.00
Quinn, K.	7/09/20	Confer with TDP working group re data exchange.	.70	665.00
Grim, E.	7/09/20	Confer with TDP subcommittee and A. Andrews re TDP issues.	.70	420.00
Gilbert, S.	7/14/20	Confer with TDP group re personal injury negotiations.	.60	900.00
Quinn, K.	7/14/20	Confer with TDP working group re personal injury negotiations.	.60	570.00
Gilbert, S.	7/27/20	Meet with team re PI TDP.	1.00	1,500.00
Quinn, K.	7/27/20	Participate in call with TDP working group re next steps.	1.00	950.00
Grim, E.	7/27/20	Confer with TDP subcommittee re strategy issues relating to TDP negotiations.	1.00	600.00
Gilbert, S.	7/28/20	Meet with PI claimants re TDP.	1.70	2,550.00
Quinn, K.	7/28/20	Participate in call with working group re TDP.	1.70	1,615.00
Grim, E.	7/28/20	Confer with TDP subcommittee and PI counsel re TDP.	1.70	1,020.00
		Project Total:	15.20	\$ 15,115.00
		TOTAL CHARGEABLE HOURS	500.0	
		TOTAL FEES		\$ 299,674.00

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#### **TIMEKEEPER SUMMARY**

Timekeeper	Hours	Rate	Total
Gilbert, S.	20.30	1,500.00	30,450.00
Quinn, K.	33.60	950.00	31,920.00
Shore, R.	39.50	1,200.00	47,400.00
Litherland, C.	6.10	1,250.00	7,625.00
Holland, P.	7.70	275.00	2,117.50
Hudson, J.	56.90	675.00	38,407.50
Girgenti, J.	42.60	335.00	14,271.00
Grim, E.	18.60	600.00	11,160.00
Wolf, D.	14.30	600.00	8,580.00
Rush, M.	23.40	640.00	14,976.00
Martinez, S.	9.10	225.00	2,047.50
Massarsky, B.	30.50	500.00	15,250.00
Johnson, K.	26.60	225.00	5,985.00
Abrishami, M.	20.40	640.00	13,056.00
Bonesteel, A.	10.60	225.00	2,385.00
Lyle, R.	49.90	305.00	15,219.50
Leveridge, R.	8.70	1,250.00	10,875.00
Chalashtori, J.	22.50	380.00	8,550.00
Ogrey, S.	10.50	190.00	1,995.00
Fastenau, L.	11.40	300.00	3,420.00
Carey, C.	21.30	380.00	8,094.00
Sraders, S.	15.50	380.00	5,890.00
TOTALS	500.00		\$ 299,674.00

#### **TASK SUMMARY**

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	436.90	245,905.00
A003	Business Operations	3.80	3,610.00
A004	Case Administration	17.80	15,417.50
A005	Claims Analysis	2.80	2,204.00
A006	Employment / Fee Applications	8.70	2,857.50
A009	Meetings / Communications with AHC & Creditors	14.80	14,565.00
A019	Plan of Reorganization / Disclosure Statement	15.20	15,115.00

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#### **EXPENSE DETAILS**

E106: Online Research

Date	Description	Task	Amount
7/28/20	Lexis	E106	122.40
7/31/20	Westlaw	E106	2,463.69
7/31/20	PACER	E106	164.80
	Sub-Total of Expenses:		\$ 2,750.89
	TOTAL EXPENSES		\$ 2,750.89
	TOTAL FEES AND EXPENSES		\$ 302.424.89